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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Amendment of Section 73.202(b))
Table of Allotments)
FM Broadcast Stations)
Saranac Lake, New York)

MM Docket No. _____

RM No. _____

RECEIVED

JUN 21 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

To: Allocations Branch, Policy and Rules Division
Mass Media Bureau

PETITION FOR RULEMAKING

Radio Vermont Classics, LLC ("Radio Vermont"), the licensee of WCVT(FM), Stowe, Vermont, by its counsel, hereby petitions the Commission to amend § 73.202(b) of its Rules to substitute Channel 227A for Channel 269A for use at Saranac Lake, New York, for the reasons stated in the attached Engineering Statement.

As set forth in the Engineering Statement, the proposed substitution will result in the upgrade of the allotment to full 6 kilowatt Class A status while also preserving WCVT's operation as a fully-spaced 6 kilowatt Class A station at its authorized site. The proposed allotment is in full compliance with domestic and international allotment requirements. Notification of this proposal to Canada is requested, as Canadian concurrence is required.

Respectfully submitted,

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RADIO VERMONT CLASSICS, LLC

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June 21, 1999

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ENGINEERING STATEMENT

PETITION FOR RULEMAKING TO
AMEND SECTION 73.202 OF THE RULES
AND REGULATIONS FOR THE FEDERAL
COMMUNICATIONS COMMISSION

TO SUBSTITUTE CHANNEL 227A FOR CHANNEL 269A
FOR USE AT SARANAC LAKE, NY

RADIO VERMONT CLASSICS, LLC

6/99

ENGINEERING STATEMENT

This Engineering Statement has been prepared on behalf of Radio Vermont Classics, LLC ("Radio Vermont"), in support of a Petition for Rulemaking to amend §73.202 of the Commission's Rules to substitute Channel 227A for Channel 269A for use at Saranac Lake, New York.

Radio Vermont is the licensee of station WCVT(FM) Channel 269A at Stowe, Vermont. The distance between the Saranac Lake Channel 269A allotment and the WCVT(FM) construction permit (FCC File No. BPH-980806IA) is 104 kilometers. This is 1 kilometer less than the 105 kilometer spacing requirement applicable under the "prior rules" provisions of §73.213(c) of the Commission's Rules.

The Saranac Lake Channel 269A allotment is a 3 kilowatt Class A allotment. The substitution of Channel 227A will result in the upgrade of the allotment to full 6 kilowatt Class A status, while also preserving WCVT's operation as a fully-spaced 6 kilowatt Class A station at its construction permit site.

Saranac Lake Channel 269A

On August 28, 1991, the Commission issued a Report and Order in MM Docket No. 90-324, allotting Channel 292C3 as a second local service to Saranac Lake, New York. WNBZ, Inc., the licensee of the 3 kW Class A station WDGE on Channel 269A at Saranac Lake, had

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opposed the allotment, but the Commission found no compelling grounds to deny the proposed allotment.

WNBZ, Inc. subsequently filed an application (FCC File No. BPH-91111271C) seeking authority to operate on Channel 292C3 in lieu of its then authorized Channel 269A. On January 26, 1993, the Commission granted the application and issued WNBZ, Inc. a construction permit specifying operation of WDGE on Channel 292C3. When the license (FCC File No. BLH-940726KB) was granted for that facility (now known as WSLK), the Channel 269A allotment was apparently removed from the FM database.

On March 12, 1999, the Saranac Lake 269A allotment seems to have been rediscovered and re-entered into the FM database at the coordinates of the previous WDGE operation. This perhaps occurred in connection with the recent petition by Dana Puopolo to add Channel 276A at Saranac Lake (MM Docket No. 99-83).

Saranac Lake Channel 227A

As outlined in the attached channel study, Channel 227A can be assigned for use at Saranac Lake in compliance with the Commission's applicable Rules and Regulations regarding the separation among domestic FM allotments and assignments. For this study the reference coordinates for the Saranac Lake Channel 269A allotment (NL 44° 20' 28" x WL 74° 7' 43") have been used.

CBM-FM 228C1 at Montreal, Quebec

The proposed Channel 227A allotment is short-spaced to Canadian station CBM-FM on Channel 228C1 at Montreal, Quebec. Under the terms of the Working Arrangement for the Allotment and Assignment of FM Broadcasting Channels Under the Agreement Between the Government of Canada and the Government of the United States of America Relating to the FM Broadcasting Service, as amended in 1997 ("Working Arrangement"), the required first-adjacent-channel Class C1 to Class A spacing is 168 kilometers, whereas the distance between the proposed Saranac Lake Channel 227A allotment site and the CBM-FM site is 136.2 kilometers. The attached allocation study map demonstrates that the Saranac Lake 48 dBu F(50,10) contour (calculated assuming operation at the allotment site with 6 kW ERP at 100 meters HAAT) will not overlap the CBM-FM 228C1 54 dBu F(50,50) contour at any location over Canadian land areas. Per the terms of Section 5.2.2.1 of the Working Arrangement, the distance to the CBM-FM 228C1 54 dBu F(50,50) protected contour has been based on maximum allowable parameters, out to a maximum distance of 86 kilometers.

The proposed allotment meets the domestic Class C1 to Class A spacing requirement of 133 kilometers with respect to CBM-FM. Therefore, the proposed operation is believed to be in full compliance with domestic and international allotment requirements.

Should there be any need to identify a channel other than Channel 227A for use at Saranac Lake, it should be noted that Channel 296A is also fully-spaced domestically, and has a relationship to CITE-FM (Channel 297C1 at Montreal, Quebec) which is identical to Channel 227A's relationship to CBM-FM.

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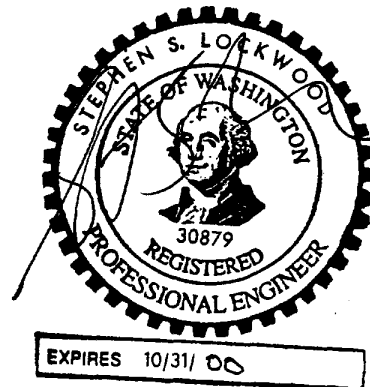
Since Saranac Lake is located within 320 kilometers of the US-Canadian border, concurrence of the Canadian government will be required. Notification of this proposal to Canada is thereby requested.

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CERTIFICATION

This Engineering Statement supporting a Petition for Rulemaking to revise the Table of Allotments to substitute Channel 227A for Channel 269A for use at Saranac Lake, New York has been prepared on behalf of Radio Vermont Classics, LLC. All representations herein are true to the best of my knowledge. I am an experienced radio engineer whose qualifications are a matter of record with the Federal Communications Commission. I am a partner in the firm of Hatfield & Dawson Consulting Engineers and am Registered as a Professional Engineer in the States of Washington and Alaska.

Signed this 18th day of June, 1999.



Stephen S. Lockwood, P.E.

Hatfield & Dawson Consulting Engineers

Seattle, WA

FM SEPARATION STUDY

Job Title :Saranac Lake 227A

Separation Buffer 100 km

Channel 227A (93.3 MHz)

FCC DB Date : 06/02/99
Coordinates : 44-20-28 74-07-43

Call Status	City State	FCC File No.	Channel Freq.	ERP(kw) HAAT(m)	Latitude Longitude	Bearing deg-Tru	Dist. (km)	Req. (km)
WPAC LIC	Ogdensburg NY	BLH860613KD	224A 92.7	3.00 95.0	44-42-21 75-27-55	291.4	113.74 82.74	31 CLEAR
Specially negotiated, short-spaced allotment-Ltd to 12.8KW ERP & 100m HAAT or the equivalent along the 296.6 degree azimuth towards channel 222A in Smiths Falls, ON; & Ltd to 6.1KW ERP & 100m Haat or the equivalent along the 240.5 degree azimuth towards CBBK, channel 225A in Kingston, ON.								
WGFR LIC	Glens Falls NY	BLED950316KB	224D 92.7	.013 90.0	43-18-44 73-38-58	161.3	120.65 .00	0 CLS=D
WEZF LIC	Burlington VT	BLH881011KF	225C 92.9	46. 824.0	44-31-40 72-48-58	78.3	106.55 11.55	95 CLOSE
Specially negotiated short-spaced allocation								
W226AC LIC	Rensselaer, etc. NY	BLFT930420TB	226D 93.1	.05 62.0	DA 42-41-23 73-42-22	169.3	186.64 .00	0 TRANS
Translator For WAMC, Albany, NY								
CKCUFM	Ottawa ON		226B 93.1	12.0 260.0	45-30-11 75-51-02	314.2	187.51 50.51	137 CLEAR
WCIZFM LIC	Watertown NY	BLH981112KM	227A 93.3	6.0 100.0	43-57-23 75-50-45	253.3	143.90 28.90	115 CLEAR
One-Step Application from Channel 228A Proposed as Class A to Canada 980226-Accepted by Canada 980402								
WCAN LIC	Canajoharie NY	BLED911010KB	227A 93.3	6. 82.0	42-53-46 74-35-45	193.3	164.92 49.92	115 CLEAR
Commercial channel operating educational Class B1 with respect to Canada-Accepted by Canada 901108								
	Coaticook QU		227A 93.3	.0	45-03-12 71-42-06	66.7	208.01 57.01	151 CLEAR
Accepted by Commission 960401								
WZZMFM LIC	Corinth NY	BLH811216AS	228A 93.5	1.35 128.0	43-14-40 73-46-18	166.7	125.20 53.20	72 CLEAR
Specially negotiated, short-spaced allotment								
CBMFM	Montreal QU		228C1 93.5	24.5 251.0	45-30-20 73-35-32	17.9	136.17 -31.83	168 SHORT
SPECIAL NEGOTIATED SHORT-SPACED ALLOCATION								

Seattle, WA

FM SEPARATION STUDY

Job Title :Saranac Lake 227A

Separation Buffer 100 km

FCC DB Date : 06/02/99

Channel 227A (93.3 MHz)

Coordinates : 44-20-28 74-07-43

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-Tru	Dist. (km)	Req. (km)
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WRFM	Remsen		228A	6.0	43-19-31	217.0	140.79	72
LIC	NY	BLH921016KE	93.5	73.0	75-10-29	SS	68.79	CLEAR
Proposed to Canada as B1 on 900918-Accepted by Canada 901108								

WRFM	Remsen		228A	1.15	43-20-44	219.5	142.73	72
CP	NY	BPH970515IB	93.5	228.0	75-15-00	SS	70.73	CLEAR
Proposed to Canada as B1 on 900918-Accepted by Canada 901108								

WRRO	Addison		229A	6.0	44-01-34	114.1	84.84	31
CPM	VT	BMPH981214IC	93.7	88.0	73-09-44		53.84	CLEAR

WQKE	Plattsburgh		230D	.009	44-41-40	52.9	65.67	0
LIC	NY	BLE811211AB	93.9	66.0	73-28-00		.00	CLS=D

WLVB	Morrisville		230A	5.4	44-34-42	76.9	121.70	31
LIC	VT	BLH930907KB	93.9	37.0	72-38-09		90.70	CLEAR
Accepted by Canada on 930302-Specially negotiated short-spaced allotment.								

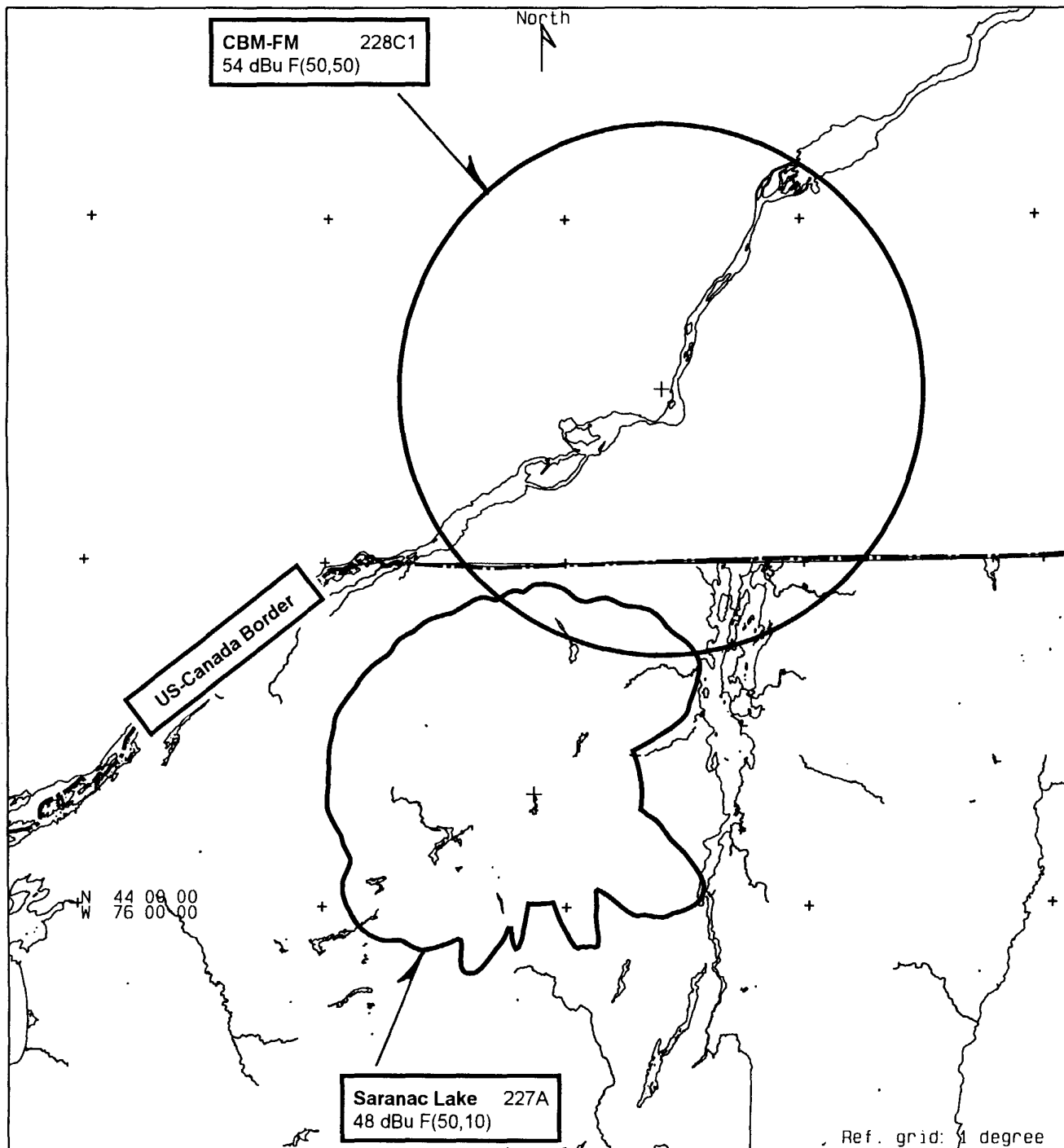
CKKL	Ottawa		230C1	95.	45-30-11	314.2	187.51	90
	ON		93.9	328.0	75-51-02		97.51	CLEAR

WANC	Ticonderoga		280A	1.55	43-49-55	134.3	80.84	10
LIC	NY	BLH821012AL	103.9	116.0	73-24-28		70.84	CLEAR

	St. Jean		281A		45-18-00	32.2	126.51	10
	QU		104.1	.0	73-16-00		116.51	CLEAR

Accepted by Commission 940610

** End of separation study for channel 227A **



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This map exhibit is included to demonstrate that the Saranac Lake 48 dBu F(50,10) contour (calculated assuming operation at the allotment site with 6 kW ERP at 100 meters HAAT) will not overlap the CBM-FM 228C1 54 dBu F(50,50) contour at any location over Canadian land areas.

Per the terms of the Working Arrangement, the distance to the CBM-FM 228C1 54 dBu F(50,50) protected contour has been based on maximum allowable parameters, out to a maximum distance of 86 kilometers.



Allocation Study Map

Hatfield and Dawson

Saranac Lake

June 1999

Ref. grid: 1 degree